



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Matthew See
Bureau of Reclamation
7794 Folsom Dam Road
Folsom, CA. 95630

Subject: Draft Supplemental Environmental Impact Statement for Mormon Island
Auxiliary Dam Modification Project (CEQ# 20090410)

Dear Mr. See:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our comments are provided in accordance with our January 7, 2010 agreement that EPA provide our comments no later than January 27, 2010. We appreciate the additional time to conduct our review.

While EPA supports actions to reduce seismic and static risks at the Mormon Island Auxiliary Dam (MIAD), we have rated the Draft Supplemental Environmental Impact Statement (DSEIS) as Environmental Concerns – Insufficient Information (EC-2) (see enclosed “*Summary of Rating Definitions*”) because of our concerns regarding the significant and unavoidable air quality impacts of construction emissions and potential impacts to vernal pools, wetlands, and riparian habitat.

We acknowledge the temporary nature of the above adverse effects and the challenge of implementing a major construction project in an Air Basin that is in non-attainment for ozone and particulate matter smaller than 10 microns (PM₁₀), and at a site which may contain Naturally Occurring Asbestos (NOA). To minimize exceedences of nitrogen oxides (a precursor for ozone), particulate matter, and NOA thresholds, we recommend continued coordination with the Sacramento Metropolitan Air Quality Management District and El Dorado County Air Quality Management District on implementation measures that will avoid and minimize emissions and NOA exposure. All air quality mitigation measures and commitments should be described and listed in the Final Supplemental Environmental Impact Statement (FSEIS) and Record of Decision (ROD).

We recommend including in an appendix the Clean Water Act Section 404 Permit for the Folsom Dam Safety/Flood Damage Reduction Project. Provide a summary of its specific requirements and a description of the anticipated 404 permit amendments for the MIAD Modification Project in the FSEIS.

We appreciate the opportunity to review this DSEIS. When the FSEIS is released for public review, please send one hard copy and one CD ROM to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or fujii.laura@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosure: Summary of Rating Definitions

cc: Molly Wright, Sacramento Metropolitan Air Quality Management District
Pete Ghelfi, Sacramento Area Flood Control Agency